



**Office of the Attorney General**

**Douglas B. Moylan**

Attorney General of Guam

**Civil Division**

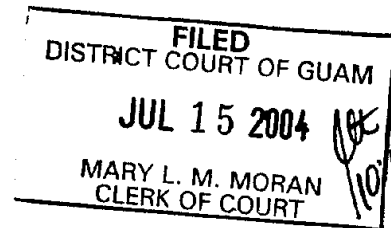
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**Attorneys for the Government of Guam**

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF GUAM**

THE GOVERNMENT OF GUAM, by and  
through the ATTORNEY GENERAL OF  
GUAM,

Plaintiff,

vs.

FELIX P. CAMACHO, in his official capacity  
as Governor of Guam,

Defendant.

Civil Case No. 04-00035

**AMENDED  
MOTION TO EXCEED PAGE  
LIMITATION AND FILE AMENDED  
MEMORANDUM IN SUPPORT OF  
MOTION FOR PRELIMINARY  
INJUNCTIVE RELIEF**

Pursuant to Local Rules of Practice LR 7.1(g), plaintiff Government of Guam respectfully moves the Court for leave to exceed the 20 page limitation for filing its "Memorandum in support of Motion for Preliminary Injunctive Relief," and to file an "Amended Memorandum in support of Motion for Preliminary Injunctive Relief," previously filed with the Court containing a Table of Contents and Table of Authorities. In support, plaintiff respectfully submits:

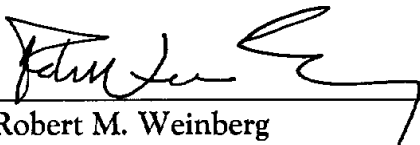
1. Page limits according to the local rules are 20 pages for memoranda in support or opposition to a pending motion. L.R. 7.1(g). The Original "Memorandum in

**ORIGINAL**

1 Support of Motion for Preliminary Injunctive Relief” contained less than 21 ½  
2 pages, specifically, 21 pages and 8 lines, including the signature block, the  
3 Memorandum thus exceeds the local rules page limits by 1 page and 8 lines.

- 4
- 5 2. The federal questions and issues presented in this matter and by the request for  
6 preliminary injunctive relief are of significant consequence to the balance of  
7 powers between coordinate officials of the Government of Guam as envisioned  
8 by the U.S. Congress in the Organic Act. Every effort was made to thoroughly  
9 brief the issues presented in as concise a manner possible, without unnecessary  
10 duplication of argument or verbiage.
- 11 3. In the event the Court is not inclined to allow the plaintiff to file an amended  
12 memorandum that exceeds the page limits by one page and 8 lines, plaintiff  
13 respectfully requests in the alternative that it be permitted to file a second  
14 amended memorandum which omits discussion of “The Alternative Test” for  
15 issuance of a preliminary injunction which begins on page 19, line 20 through  
16 page 21, line 4 of the original and amended memoranda already on file.
- 17 4. A proposed order is attached.

18 OFFICE OF THE ATTORNEY GENERAL  
19 DOUGLAS B. MOYLAN, Attorney General of Guam

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21 Robert M. Weinberg  
22 Assistant Attorney General  
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**CERTIFICATE OF SERVICE**

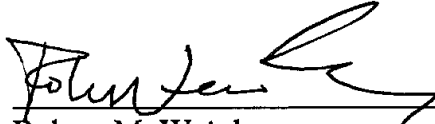
This is to certify that I have this day served opposing counsel with a copy of the foregoing by hand delivery, or by depositing same in the United States Mail, postage prepaid, and properly addressed to:

Shannon Taitano, Esq.  
Legal Counsel, Governor's Office  
P.O. Box 2950  
Hagåtña, Guam 96932

Michael A. Pangelinan, Esq.  
Calvo and Clark, LLP  
Attorneys at Law  
655 South Marine Corps Drive, Suite 202  
Tamuning, Guam 96911

this 15<sup>th</sup> day of July, 2004.

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DOUGLAS B. MOYLAN, Attorney General of Guam

  
Robert M. Weinberg  
Assistant Attorney General